

**U.S. Bankruptcy Court
California Northern Bankruptcy Court (San Francisco)
Bankruptcy Petition #: 19-30088**

Assigned to: Judge Dennis Montali
Chapter 11
Voluntary
Asset

Date filed: 01/29/2019
Plan confirmed: 06/20/2020
341 meeting: 04/29/2019
Deadline for filing claims: 10/21/2019
Deadline for filing claims (govt.): 10/21/2019

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TERMINATED: 04/07/2021

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TERMINATED: 04/01/2020

Filing Date	#		Docket Text
03/21/2022		<u>12051</u>	Appellant's Clarification and Exhibit List and Designation of Contents For Inclusion in Record On Appeal (RE: related document(s) <u>11835</u> Notice of Appeal and Statement of Election filed by Creditor William F. Weidman). Appellee designation due by 4/6/2022. Filed by Creditor William F. Weidman III (dc). (Entered: 03/21/2022)
04/04/2022		<u>12103</u>	Appellee Designation of Contents for Inclusion in Record of Appeal <i>Appellees' (I) Response to William F. Weidman, III's Appellant's Clarification and Exhibit List and (II) Designation of Additional Items to Be Included in the Record on Appeal</i> (RE: related document(s) <u>11835</u> Notice of Appeal and Statement of Election filed by Creditor William F. Weidman). Filed by Debtor PG&E Corporation (Rupp, Thomas) (Entered: 04/04/2022)

FILED
MAR 21 2022
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Case No. 22-cv-00389-HSG

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)(Jointly Administered)

APPELLANT'S CLARIFICATION AND
EXHIBIT LIST

Judge: Hon. Haywood S. Gilliam
United States District Court
1301 Clay St #400s, Oakland, CA 94612
Phone: (510) 637-3530

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

On March 10, 2022 I spoke to Clerk DeWana Chambers. Ms. DeWana told me that I needed to clarify the issue I have regarding the mail situation. She further told me that I needed to clarify the items I am designating for the appeal record and that I needed to send this information to both Judge Gilliam, United States District Court and Judge Dennis

1 Montali, U.S. Bankruptcy Court, Northern District of California - San Francisco Division,
2 450 Golden Gate Avenue, Mail Box 36099, San Francisco, CA 94102.

- 3 1. I am a man in his late-70's who is not very technologically advanced and live in
4 an area where I get very spotty service. I am constantly having problems with
5 my computer and missing emails. What I can count on is my mail being
6 delivered by the U.S. Postal Service; however, it is currently taking
7 approximately 6 to 8 days for me to get mail delivered that is being sent from
8 California. I have not agreed to receive electronic notification because I cannot
9 guaranty I will actually receive it and I need for mailing time to be included in
10 any deadlines set for me.
- 11 2. The Exhibits I am designating for the appeal record are:
- 12 a. Exhibit "A" is the Armed Forces Institute of Pathology Report ("AFIP
13 Report").
 - 14 b. Exhibit "B" is the Diablo Canyon Nuclear Regulatory Commission
15 ("NRC) permit material.
 - 16 c. Exhibit "C" is the material from the County and State showing no proper
17 permits were granted when I was exposed.
 - 18 d. Exhibit "D" is correspondence from 2005-2006 showing that Appellee
19 PG&E Corporation ("PG&E") via their counsel was aware of my exposure case
20 at California Worker's Compensation Appeals Board.
- 21 3. My clarification statement for this appeal boils down to the fact that the Price
22 Anderson Act which added Section 170 of the Atomic Energy Act of 1954 (42
23 U.S.C. 2210) for radiation matters clearly states that the statute of limitations
24 DOES NOT apply. This matter hinges for appeal on whether the United States
25 Bankruptcy Court erred in its decision that California State Statute of
26 Limitations applies even though the Price Anderson Act states otherwise and
27 that at the time of exposure the facility was not properly permitted or licensed
28 where the incident occurred and that PG&E is trying to be relieved of obligation
in this matter.

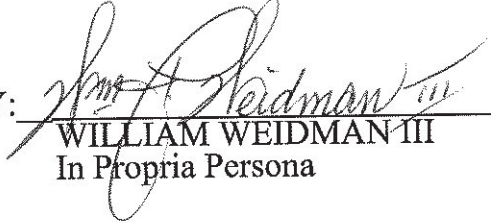
1 4. Also, with PG&E filing bankruptcy and with my later stage of Worker's
2 Compensation Court matter, in order to preserve all my rights pursuant to the
3 Price Anderson Act and my claims thereto, I filed my bankruptcy matter as
4 required and seen in all related radiation cases or matters.

5
6 DATED: March/8, 2022

Respectfully submitted,

7 Wm. F. Weidman, III, Appellant

8
9 BY:


10 WILLIAM WEIDMAN III
11 In Propria Persona
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EXHIBIT "A"

Armed Forces Institute of Pathology Report ("AFIP Report")



DEPARTMENT OF DEFENSE
ARMED FORCES INSTITUTE OF PATHOLOGY
WASHINGTON, DC 20306-6099

REPLY TO
ATTENTION OF

PATIENT IDENTIFICATION

AFIP ACCESSION NO.
2732271

WEIDMAN, William F.
00:56875 S
June 12, 2000

SEQUENCE NO.

00
SSN: 216-42-5221
LHS/CH/rlu
CH

James W. Eagan, Jr., M.D.
St. Joseph Medical Center
Department of Pathology
7601 Osler Drive
Towson, MD 21204

AFIP REPORT 00:56875 A. Perianal area: Portions of skin with acanthosis, papillomatosis and ~~proliferation~~ as well as mild superficial acute and chronic inflammation of the dermis with fibrosis, dilated veins and mild atypia of stromal cells.
B. Colon, sigmoid (polyps), biopsies: Fragments of colonic mucosa with focal suggestion of surface hyperplastic change and focal lymphoid nodules.
C. Rectum (polyp), biopsy: Hyperplastic polyp.

The case was reviewed in consultation with the members of the Department of Environmental and Toxicologic Pathology.

The dilated veins and mild atypia of dermal stromal cells seen in the perianal area (A) could be due to a variety of causes including radiation.

A copy of this report has been faxed to you at 410-337-1712.

Leslie H. Sobin, M.D.

Chief

Division of Gastrointestinal Pathology

Department of Hepatic and Gastrointestinal Pathology
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EXHIBIT “B”

Diablo Canyon Nuclear Regulatory Commission (“NRC) permit material

EVALUATION OF REQUEST FOR EXTENSION OF THE CONSTRUCTION PERMIT

COMPLETION DATES FOR THE DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1 AND 2

Introduction

On November 26, 1979, Pacific Gas and Electric Company (PG&E) filed a request for extension of the completion dates of the construction permits for the Diablo Canyon Nuclear Power Plant, Units 1 and 2. The extensions requested were from December 31, 1979 to September 30, 1980 for Unit 1 and from February 29, 1980 to March 31, 1981 for Unit 2. In the requests for extension PG&E stated that the additional time for Unit 1 was needed to conclude the licensing process and to comfortably accommodate the Commission's announcement of a pause in issuing operating licenses until spring 1980.

Discussion

The construction permit for Unit 1, CPPR-39, was issued on April 23, 1968, and was last modified by the Commission's Order dated July 11, 1979, which extended the latest completion date to December 31, 1979. The construction permit for Unit 2, CPPR-69, was issued on December 9, 1970, and was last modified by the Commission's Order dated April 1979, which extended the latest completion date to February 29, 1980.

Additional time contingencies will be required to allow for satisfactory completion of modifications and new requirements arising from the President's Commission and the NRC's staff investigation of the incident at the Three Mile Island Nuclear Power Plant, Unit 2 to the Diablo Canyon Nuclear Power Plants, Units 1 and 2, to the extent that they are applicable. Priority is being given to completing Unit 1.

Accordingly, PG&E has requested an extension of the latest completion dates in CPPR-39 for Unit 1 to September 30, 1980 and in CPPR-69 for Unit 2 to March 31, 1981.

Conclusion

The Commission's staff have reviewed the information provided in the applicant's submittal, and we conclude that the factors discussed above are reasonable and constitute good cause for delay; and the extension of construction of Unit 1 for 9 months and of Unit 2 for 13 months is justifiable.

8002270535

OFFICE						
SURNAME						
DATE	Case: 19-30088	Doc# 12021-2	Filed 03/21/82	Entered 03/21/82	23143521	Page 15

As a result of the staff's review of the Final Safety Analysis Report to date, and considering the nature of the delays, we have identified no area of significant safety considerations in connection with the extension of the construction permit completion dates for the Diablo Canyon Nuclear Power Plant, Units 1 and 2.

The assessment of potential environmental impacts associated with site preparation and the construction of Units 1 and 2 of the Diablo Canyon Nuclear Power Plant were addressed in the Final Environmental Statement (FES) issued in May 1973. Since the construction of Unit No. 1 is essentially complete except for installation of certain modifications and construction of Unit 2 is approximately 98% complete, essentially all construction impacts have occurred. The continuation of a limited construction work force on site for an additional 13 months is not expected to have any increased impact on the local environment or the nearby communities. The staff has determined that the extension of time for completion of work shown in Construction Permit No. CPPR-39 from December 31, 1979 to September 30, 1980 and in CPPR-69 from February 29, 1980 to March 31, 1981, is an administrative action since it does not alter impacts described in the FES or create new impacts not previously addressed in the statement. Having made this determination, the Commission has concluded, pursuant to 10 CFR Part 51.5 (d)(4), that an environmental statement, negative declaration or environmental impact appraisal need not be prepared in connection with the issuance of this extension of time.

The staff finds that this action does not involve a significant hazards consideration, that good cause exists for the issuance of an Order extending the completion dates, and that an environmental statement, negative declaration or environmental impact appraisal need not be prepared in connection with the issuance of such order.

Accordingly, issuance of an Order extending the latest completion dates for construction of Diablo Canyon Unit 1, as set forth in CPPR-39, to September 30, 1980 and of Unit 2, as set forth in CPPR-69, to March 31, 1981, is reasonable and should be authorized.

Original Signed by

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Light Water Reactors Branch No. 1
Division of Project Management

Original Signed by

John F. Stolz, Chief
Light Water Reactors Branch No. 1
Division of Project Management

Dated: FEB 02 1980

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SURNAME	BCBuckley:pcm	JFStolz				
DATE	Case: 19-30088	Doc# 1202802	File# 03740022	Entered 037408223143521	Page	16

IT IS HEREBY ORDERED that the latest completion date for CPPR-39 is extended from December 31, 1979 to September 30, 1980 for Unit 1 and the latest completion date for CPPR-69 is extended from February 29, 1980 to March 31, 1981 for Unit 2.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By
D. F. Ross

D. F. Ross, Jr., Acting Director
Division of Project Management
Office of Nuclear Reactor Regulation

Date of Issuance: FEB 02 1980

DPM:DD NRBenton

DBVassallo HRDenton

01/ /80 01/ /80

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DATE	01/ /80	01/ /80	01/ /80	01/ /80	01/ /80	01/ /80

Case: 19-30088

Doc# 12021-2

Filed 03/08/22

Entered 03/08/22

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Page 17



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555
February 12, 1980

DISTRIBUTION:
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LWR #1 Rdg
EGHy1ton

Docket No. **50-275 & 50-323**

Docketing and Service Section
Office of the Secretary of the Commission

**SUBJECT: ORDER EXTENDING CONSTRUCTION COMPLETION DATES FOR DIABLO CANYON,
UNITS 1 AND 2**

Two signed originals of the Federal Register Notice identified below are enclosed for your transmittal to the Office of the Federal Register for publication. Additional conformed copies (**15**) of the Notice are enclosed for your use.

- ☐ Notice of Receipt of Application for Construction Permit(s) and Operating License(s).
- ☐ Notice of Receipt of Partial Application for Construction Permit(s) and Facility License(s): Time for Submission of Views on Antitrust Matters.
- ☐ Notice of Availability of Applicant's Environmental Report.
- ☐ Notice of Proposed Issuance of Amendment to Facility Operating License.
- ☐ Notice of Receipt of Application for Facility License(s); Notice of Availability of Applicant's Environmental Report; and Notice of Consideration of Issuance of Facility License(s) and Notice of Opportunity for Hearing.
- ☐ Notice of Availability of NRC Draft/Final Environmental Statement.
- ☐ Notice of Limited Work Authorization.
- ☐ Notice of Availability of Safety Evaluation Report.
- ☐ Notice of Issuance of Construction Permit(s).
- ☐ Notice of Issuance of Facility Operating License(s) or Amendment(s).
- ☒ Other: **Order Extending Construction Completion Dates for Diablo Canyon,
Units 1 and 2.**

Office of Nuclear Reactor Regulation

Enclosure:
As Stated

P.S. Extra copy of letter and order enclosed for NRC PDR.

LWR #1
EGHy1ton

2/12/80

NRC FORM 102
(1-76)

Case: 19-30088 Doc# 1120521-2 Filed 03/04/06 Entered 03/04/06 23:14:35 Page 18 of 238



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555
February 12, 1980

DISTRIBUTION:
DOCKETS (2)
LWR #1 Rdg
EGHylton

Docket No. **50-275 & 50-323**

Docketing and Service Section
Office of the Secretary of the Commission

SUBJECT: **ORDER EXTENDING CONSTRUCTION COMPLETION DATES FOR DIABLO CANYON,
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Two signed originals of the Federal Register Notice identified below are enclosed for your transmittal to the Office of the Federal Register for publication. Additional conformed copies (15) of the Notice are enclosed for your use.

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- ☐ Notice of Limited Work Authorization.
- ☐ Notice of Availability of Safety Evaluation Report.
- ☐ Notice of Issuance of Construction Permit(s).
- ☐ Notice of Issuance of Facility Operating License(s) or Amendment(s).
- ☒ Other: Order Extending Construction Completion Dates for Diablo Canyon,
Units 1 and 2.

Office of Nuclear Reactor Regulation

Enclosure:
As Stated

~~P.S. Extra copy of letter and order enclosed for NRC PDR.~~

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SURNAME →	EGHylton					
DATE →	2/12/80					

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cc: Richard S. Salzman, Esq., Chairman
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321 Lytton Avenue
Palo Alto, California 94302

Yale I. Jones, Esq.
100 Van Ness Avenue
19th Floor
San Francisco, California 94102

Ms. Raye Fleming
1920 Mattie Road
Shell Beach, California 93440

Mr. Richard Hubbard
MHB Technical Associates
1723 Hamilton Avenue
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San Jose, California 95125

Dr. William E. Martin
Senior Ecologist
Battelle Memorial Institute
Columbus, Ohio 43201

Mr. James O. Schuyler, Nuclear
Projects Engineer
Pacific Gas & Electric Company
77 Beale Street
San Francisco, California 94106

Mr. W. C. Gangloff
Westinghouse Electric Corporation
P. O. Box 355
Pittsburgh, Pennsylvania 15230

Brent Rushforth, Esq.
Center for Law in the Public
Interest
10203 Santa Monica Boulevard
Los Angeles, California 90067

Arthur C. Gehr, Esq.
Snell & Wilmer
3100 Valley Center
Phoenix, Arizona 85073

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3216 North 3rd Street
Suite 202
Phoenix, Arizona 85012

Michael R. Klein, Esq.
Wilmer, Cutler & Pickering
1666 K Street, N. W.
Washington, D. C. 20006

David F. Fleischaker, Esq.
1735 Eye Street, N. W.
Suite 709
Washington, D. C. 20006

Mr. John C. Morrissey

cc: California Dept. of Health
ATTN: Chief, Environmental
Radiation Control Unit
Radiologic Health Section
714 P Street - Room 498
Sacramento, California 95814

Chairman San Luis Obispo County
Board of Supervisors
County Courthouse Annex - Room 220
San Luis Obispo, California 93401

U. S. Environmental Protection Agency
ATTN: EIS Coordinator
Region IX Office
100 California Street
San Francisco, California 94111

Mr. John Marrs, Managing Editor
San Luis Obispo County
Telegram - Tribune
1321 Johnson Avenue
P. O. Box 112
San Luis Obispo, California 93406

Elizabeth S. Bowers, Chairman
Atomic Safety & Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Glenn O. Bright
Atomic Safety & Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Tolbert Young
P. O. Box 219
Avila Beach, California 93424

Dr. W. Reed Johnson
Atomic Safety & Licensing
Appeal Board
U. S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Alan S. Rosenthal, Esq.
Atomic Safety & Licensing
Appeal Board
U. S. Nuclear Regulatory
Commission
Washington, D. C. 20555

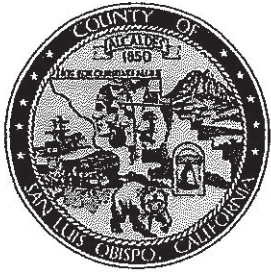
W. Andrew Baldwin, Esq.
124 Speak Street
San Francisco, California 94105

Resident Inspector/Diablo
Canyon NPS
c/o U. S. NRC
P.O. Box 219
Avila Beach, California 93424

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EXHIBIT "C"

**Material from the County and State showing no proper permits were
granted when Appellant was exposed**



SAN LUIS OBISPO COUNTY
DEPARTMENT OF PLANNING AND BUILDING

June 10, 2015

To Whom it may concern,

The Planning & Bldg Dept has no record of workmen's comp insurance for the permits issued to Diablo Canyon.

To the best of my research we have no permits for the power generation at the plant.

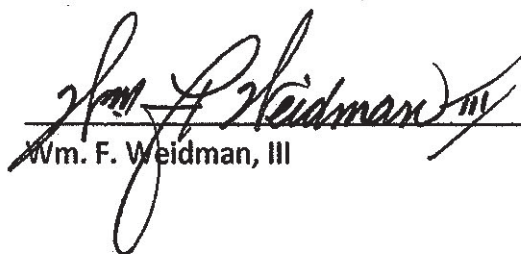
THS

Stephen P. Hicks
Supervising Plans Examiner.

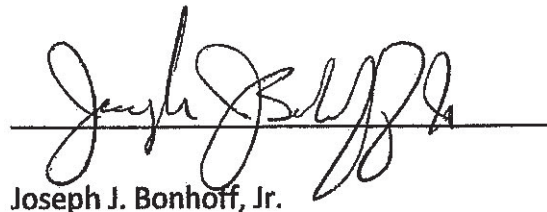
Court Copy

State of Maryland
County of Harford, to wit:

On this 9th day of November, 2021, before me, the subscriber, a Notary Public of the State of Maryland, in and for Harford County, personally appeared Wm. F. Weidman, III, and made oath or affirmation in due form of law that the matter and facts set forth in the correspondence from Stephen P. Hicks, Supervisor Plans Examiner are true.


Wm. F. Weidman, III

As WITNESS my hand and notarial seal.


Joseph J. Bonhoff, Jr.

Notary Public

My Commission expires Nov. 21, 2023



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EXHIBIT “D”

Correspondence from 2005-2006 showing that Appellee PG&E Corporation (“PG&E”) via their counsel was aware of Appellant’s exposure case at California Worker’s Compensation Appeals Board

Pacific Gas and Electric Company
Humboldt Bay Power Plant
ROY B. WILLIS
Plant Manager

1000 King Salmon Avenue
Eureka, CA 95503
707/444-0700

August 17, 2004



Law Office of Brian W. Collins
C/O William F. Weidman
1980 Orange Tree Lane #105
Redlands, California 92374

Re: Occupational Radiation Exposure Records Request

Dear Mr. Collins:

A review of our records indicate that the individual named William F. Weidman, SSN: [REDACTED] was not badged for occupational radiation at Pacific Gas & Electric Company's Humboldt Bay Power Plant.

In accordance with 10 CFR 19 and 20, Pacific Gas and Electric Company maintains occupational radiation exposure histories of all individuals assigned personal dosimetry as required by 10 CFR 20.1502. No dosimetry devices have been issued for the individual listed below.

Name: William F. Weidman

SSN: [REDACTED]

This report is furnished to you under the provisions of the Nuclear Regulatory Commission Regulation 10 CFR Part 19. You should preserve this report for further reference.

Sincerely,


ROY B. WILLIS

Dosimetry Group
 Radiation Protection Section
 Pacific Gas and Electric Company
 Diablo Canyon Power Plant
 (119 1/122)
 P.O. Box 56
 Avila Beach, CA 93424

August 18, 2004



Law Office of Brian W. Collins
 C/O William F. Weidman
 1980 Orange Tree Lane #105
 Redlands, California 92374

Re: Occupational Radiation Exposure History

NAME: William F. Weidman

SSN: [REDACTED]

After a thorough search of our files, we have found no record of any entries into our Radiologically Controlled Areas during the requested time periods, (1984-1985.)

The above named individual:

X was not monitored by Pacific Gas and Electric Company at Diablo Canyon Power Plant.

_____ was monitored by Pacific Gas and Electric Company at Diablo Canyon Power Plant on dates other than those requested.

This report is furnished to you under the provisions of the Nuclear Regulatory Commission, regulation 10 CFR Part 19. You should preserve this report for further reference.

Sincerely,

Jeffrey D. Harker
 Dosimetry and Technical Support Supervisor



Pacific Gas and
Electric Company™

Emily Schultz

Mailing Address
P.O. Box 7442
San Francisco, CA 94120

Street/Courier Address
Law Department
77 Beale Street
San Francisco, CA 94105

(415) 973-3671
Fax: (415) 973-5520
Internet: E1SW@pge.com

August 23, 2011

VIA FACSIMILE

Stephen L. Chesney
Law Offices of Stephen L. Chesney
4400 Coldwater Canyon Ave., Ste. 201
Studio City, CA 91604

Re: Weidman v. Bechtel Power Corp.
Subpoena for Records to PG&E

Dear Mr. Chesney:

This will respond to your correspondence of August 14, 2011.

Regarding the employment-related records requested in your subpoena, I spoke to Steve Lorence, the Director of Human Resources at Diablo Canyon Power Plant. Mr. Lorence confirmed that Mr. Weidman was a contractor when he performed work related to the Diablo Canyon Power Plant. PG&E does not retain the employment-related records you requested for contractors. I suggest that you contact the agency that employed Mr. Weidman as a contractor in 1984-1986 for the records. Any records related to Mr. Weidman's access to Diablo Canyon Power Plant would not have been retained more than five years, per 10 CFR 73.56(o) (i), (ii), and (iii). Therefore, PG&E does not currently have any access records for Mr. Weidman.

As for the engineering records you requested in the subpoena, we previously checked the Diablo Canyon Power Plant records but were unable to locate any responsive documents from 1984-1986. As a courtesy to you, I will ask the appropriate representatives at the Diablo Canyon Power Plant to again check whether any responsive records are available. If responsive records are located, I will let you know as soon as possible.

Sincerely,

Emily Schultz

Law Offices of Stephen L. Chesney

Attorneys At Law

4400 Coldwater Canyon Avenue, Suite 201 ~ Studio City, California 91604
Phone (818) 760-9900 ~ Fax (818) 344-9186 ~
Email schesney@chesneylegal.com

January 25, 2012

Barbara Thornhill
Pacific Gas & Electric Company
P.O. Box 7442
San Francisco, California 94120

Re: Weidman v. Bechtel
WCAB Case No. ADJ3663372/SBR0303384

Dear Ms. Thornhill:

I am the attorney for William Weidman III in the above-referenced matter. On behalf of my client, I authorized you to release to me all records requested in the subpoena duces tecum, including any personal records of Mr. Weidman.

Thank you for your courtesy and cooperation in this matter.

Very truly yours,

LAW OFFICES OF STEPHEN L. CHESNEY


By: Stephen L. Chesney

SLC:sc



**Pacific Gas and
Electric Company***

Law Department
Workers' Compensation

P. O. Box 7779
San Francisco, CA 94120-7779
Fax: 415.536.5996
(415) 973-4187

May 9, 2012

UPS - NEXT DAY AIR

Stephen L. Chesney, Esq.
4400 Coldwater Canyon Ave., #201
Studio City, CA 91604

Re: William Weidman, III v. Bechtel Power Corp.
WCAB Case No. ADJ3663372

Dear Mr. Chesney:

Enclosed are records to answer the Subpoena Duces Tecum dated January 25, 2012. The certification of these records will be forwarded under separate cover.

Also enclosed is a Certificate of Records of Regularly Conducted Activity indicating that we have no records for entry to radiologically controlled areas.

Thank you for your courtesy and patience.

Very truly yours,

Patricia A. Higa
Attorney for PG&E

:kea

Enclosures

1 **Proof of Service**

2 STATE OF MARYLAND, COUNTY OF HARFORD

3 I, Wm F. Weidman, III, declare as follows:

4 On March 18, 2022, I served APPELLANT'S CLARIFICATION AND EXHIBIT LIST
5 on the Attorneys for Appellees by Express Mail by placing a copy thereof in an individual
6 envelope addressed as shown below and depositing said envelope for collection and
mailing on the aforesaid date by placement for deposit on the same day in the United
States Postal Service.

7 KELLER BENVENUTTI KIM LLP
8 Jane Kim (#298192)
9 David A. Taylor (#247433)
650 California Street, Suite 1900
San Francisco, CA 94108

10
11 I declare under penalty of perjury under the laws of the State of
Maryland and the United States that the foregoing is true and correct and
12 that this declaration was executed March 18, 2022, Benson, Maryland.

13
14 BY:  _____

15 Wm F. Weidman, III
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Intake Filing Clerk:

03-18-2022

Please file the attached Request for Case No. . *19-30088(DM) Chapt. 11*
and return a conformed copy in the enclosed self-addressed
envelope.

I have also enclosed an additional courtesy copy to be given to Judge:

Honorable Dennis Montali

*Required to Send to
Judge Montali*

*see page 1 ln 27
page 2 ln 1*

KELLER BENVENUTTI KIM LLP

Jane Kim (#298192)

(jkim@kbkllp.com)

David A. Taylor (#247433)

(dtaylor@kbkllp.com)

Thomas B. Rupp (#278041)

(trupp@kbkllp.com)

650 California Street, Suite 1900

San Francisco, CA 94108

Tel: (415) 496-6723

Fax: (650) 636 9251

*Attorneys for Appellees (Debtors and
Reorganized Debtors)*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

**Reorganized
Debtors.**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Reorganized Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

District Court Case No. 22-cv-00389-HSG

**APPELLEES' (I) RESPONSE TO
WILLIAM F. WEIDMAN, III'S
APPELLANT'S CLARIFICATION AND
EXHIBIT LIST AND (II) DESIGNATION
OF ADDITIONAL ITEMS TO BE
INCLUDED IN THE RECORD ON
APPEAL**

PG&E Corporation and Pacific Gas and Electric Company (collectively, the “**Appellees**,” the “**Debtors**,” or as reorganized pursuant to the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* [Dkt. No. 8048] (as it may be amended, modified, or supplemented and together with any exhibits or schedules thereto), the “**Reorganized Debtors**”) submit this response to the March 21, 2022 filing by William F. Weidman, III (“**Appellant**”) of the *Appellant’s Clarification and Exhibit List* [Dkt. No. 12051] (the “**Statement**”), and designation of additional items to be included in the record on appeal, in connection with Appellant’s appeal from the *Order Denying Motion for Reconsideration by William F. Weidman, III*, entered on December 15, 2021 [Dkt. No. 11706], by the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”).

I. RESPONSE TO STATEMENT OF ISSUES ON APPEAL

The sole issue on appeal is whether the Bankruptcy Court abused its discretion in denying Appellant’s motion for reconsideration of the order disallowing his claim, under the grounds for reconsideration available under Rule 60(b) of the Federal Rule of Civil Procedure.

II. DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED IN RECORD ON APPEAL

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, the Reorganized Debtors hereby designate the following additional items to be included in the record on appeal, which include all exhibits and addenda attached thereto and filed therewith and all documents incorporated by reference therein:

Docket items from *In re PG&E Corp., et al.*, Case No. 19-30088 (DM):

Dkt. No.	Description	Date
263	Amended Declaration of Jason P. Wells in Support of First Day Motions and Related Relief	02/01/2019
8053	Order Confirming Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020	06/20/2020

Dkt. No.	Description	Date
8228	Order Approving (A) Procedures for Filing Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections	06/30/2020
10494	Order Further Extending Deadline for the Reorganized Debtors to Object to Claims and Granting Related Relief	04/05/2021
11120	Reorganized Debtors' One Hundred Second Omnibus Objection to Claims (No Legal Liability Claims)	08/19/2021
11121	Declaration of A. Anna Capelle in Support of Reorganized Debtors' One Hundred Second Omnibus Objection to Claims (No Legal Liability Claims)	08/19/2021
11122	Notice of Hearing on Reorganized Debtors' One Hundred Second Omnibus Objection to Claims (No Legal Liability Claims)	08/19/2021
11156	Certificate of Service of Sonia Akter	08/25/2021
11239	Opposition to Notice of the Reorganized Debtors' One Hundred Second Omnibus Objection to Claims (No Legal Liability Claims); Declaration in Support Thereof	09/10/2021
11298	Reply in Support of Reorganized Debtors' Omnibus Objections to Claims	09/22/2021
11334	Certificate of Service of Joseph Ledwin	09/28/2021
11381	Order Disallowing Proof of Claim #10281 Filed by William F. Weidman, III	10/06/2021
11413	Certificate of Service of Alain B. Francoeur	10/13/2021
11444	Motion to Extend Time to File a Motion to Reconsider	10/19/2021
11446	Order Granting Extension of Time for William F. Weidman, III to File a Motion for Reconsideration	10/19/2021
11460	Certificate of Service of Rohany Tejada	10/21/2021
11507	Motion to Extend Time to File a Motion for Reconsideration	10/29/2021
11513	Order Granting Further Extension of Time for William F. Weidman, III to File a Motion for Reconsideration	11/02/2021
11552	Certificate of Service of Alain B. Francoeur	11/08/2021

Dkt. No.	Description	Date
11584	Order Granting Third Extension of Time for William F. Weidman, III to File a Motion for Reconsideration	11/16/2021
11596	Petition for Reconsideration	11/17/2021
11602	Order Regarding Motion for Reconsideration by William F. Weidman, III	11/19/2021
11624	Certificate of Service of Sonia Akter	11/29/2021
11635	Certificate of Service of Sonia Akter	11/30/2021
11643	Certificate of Service of Liliya Kulyk	12/01/2021
11688	Reorganized Debtors' Opposition to Motion for Reconsideration of William F. Weidman III	12/10/2021
11706	Order Denying Motion for Reconsideration by William F. Weidman, III	12/14/2021
11712	Certificate of Service of Sonia Akter	12/17/2021
11789	Certificate of Service of Joseph Ledwin	01/04/2022
11835	Notice of Appeal and Statement of Election	01/18/2022
12051	Appellant's Clarification and Exhibit List	03/21/2022

Hearing Transcripts from *In re PG&E Corp., et al.*, Case No. 19-30088 (DM):

Dkt. No.	Description	Date
11364	September 29, 2021 Hearing Transcript	10/01/2021

Proofs of Claim filed in *In re PG&E Corp., et al.*, Case No. 19-30088 (DM):

Claim No.	Claimant	Date
10281	Wm. F. Weidman, III	09/30/2019

The Reorganized Debtors reserve the right to designate additional items for inclusion in the record or restate the issues presented on appeal.

III. RESPONSE TO APPELLANT'S DESIGNATION OF RECORD

Appellant's Statement does not designate any docket entries or transcripts in the Chapter 11 Cases, but instead refers to its four attached exhibits. Exhibits B, C, and D appear to contain documents identical to those attached as Exhibits 2, 1, and 3, respectively, to Appellant's *Petition for Reconsideration*, filed on November 17, 2021 [Docket No. 11596], which is designated in its entirety in Section II, *supra*. The letter submitted as Exhibit A does not appear to have been previously filed with the Bankruptcy Court. Appellees submit that only those documents actually filed with the Bankruptcy Court in connection with its ruling on the order that is the subject of the appeal are part of the record on appeal, and Appellees reserve all rights and defenses thereto.

Dated: April 4, 2022

KELLER BENVENUTTI KIM LLP

By: /s/ Jane Kim
Jane Kim

Attorneys for the Appellees (Debtors and Reorganized Debtors)